

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI  
OXFORD DIVISION

**WILLIAM ROBERTS WILSON, JR., AND  
ROBERTS WILSON, JR., P.C. successor to  
WM. ROBERTS WILSON, JR., P.A.**

**PLAINTIFFS**

**VS.**

**3:09cv006**

**RICHARD F. SCRUGGS, RICHARD F. SCRUGGS, P.A.,  
SMBD, INC. f/k/a SCRUGGS LEGAL, P.A.  
f/k/a SCRUGGS, MILLETTE, BOZEMAN AND DENT, P.A.,  
SLF, INC. f/k/a THE SCRUGGS LAW FIRM, P.A.,  
EDWARD J. PETERS, STEVEN A. PATTERSON,  
TIMOTHY BALDUCCI, DAVID ZACHARY SCRUGGS, and  
JOHN DOES 1-10**

**DEFENDANTS**

**PLAINTIFFS' UNOPPOSED MOTION FOR EXTENSION  
OF TIME TO FILE RESPONSE TO  
DEFENDANT STEVEN A. PATTERSON'S MOTION TO DISMISS**

COME NOW the plaintiffs, Wm. Roberts Wilson, Jr., and Roberts Wilson, Jr., P.C., by and through their attorneys, and file this motion for thirty additional days from October 8, 2009, to file a response and submit a memorandum in opposition to the motion to dismiss filed by defendant Steven A. Patterson. In support of this motion, Wilson would show that the recent death of Mr. Merkel's mother and the trial schedules of counsel necessitate more time to formulate a response in this action and that there is no objection from the defendant Patterson to this request for thirty additional days.

WHEREFORE, PREMISES CONSIDERED, Wilson prays for thirty additional days or until November 7, 2009 to file an opposition and memorandum in opposition to the motion filed by the defendant Steven A. Patterson cited above.

Respectfully submitted, this the 6<sup>th</sup> day of October, 2009.

WM. ROBERTS WILSON, JR. and  
ROBERTS WILSON, JR., P.C.,  
PLAINTIFFS

BY: /s/Vicki R. Slater

VICKI R. SLATER, (MSB 9759)  
COUNSEL FOR THE  
WILSON PLAINTIFFS

OF COUNSEL:

VICKI R. SLATER, MSB#9759  
VICKI R. SLATER, ATTORNEY AT LAW, P.A  
1554 LAKESIDE DRIVE  
POST OFFICE BOX 23981  
JACKSON, MISSISSIPPI 39225-3981  
TELEPHONE: (601)987-8184  
FACSIMILE: (601)987-8188

WILLIAM B. KIRKSEY, MSB#4183  
KIRKSEY & ASSOCIATES  
POST OFFICE BOX 33  
JACKSON, MISSISSIPPI 39205-0033  
TELEPHONE: (601)354-4662  
FACSIMILE: (601)354-2433

CHARLES M. MERKEL, JR., MSB#2884  
CYNTHIA I. MITCHELL, MSB#3356  
MERKEL & COCKE, P.A.  
30 DELTA DRIVE  
POST OFFICE BOX 1388  
CLARKSDALE, MISSISSIPPI 38614-1388  
TELEPHONE: (662)-627-9641  
FACSIMILE (662)627-3592

**CERTIFICATE OF SERVICE**

The undersigned does hereby certify that a true and correct copy of the foregoing document was this day forwarded to the Clerk of Court using the ECF system which sent notification of such filing to the following:

Gerald H. Jacks, Esquire  
Jamie F. Jacks, Esquire  
Jacks, Adams & Norquist, P.A.  
[gjacks@jacksadamsnorquist.com](mailto:gjacks@jacksadamsnorquist.com)  
[jjacks@jacksadamsnorquist.com](mailto:jjacks@jacksadamsnorquist.com)

Hiram Eastland, Jr., Esquire  
[eastlandlaw@bellsouth.net](mailto:eastlandlaw@bellsouth.net)

J. Cal Mayo, Jr., Esquire  
Paul Bowie Watkins, Jr., Esquire  
Pope S. Mallette, Esquire  
[cmayo@mayomallette.com](mailto:cmayo@mayomallette.com)  
[pwatkins@mayomallette.com](mailto:pwatkins@mayomallette.com)  
[pmallette@mayomallette.com](mailto:pmallette@mayomallette.com)

Michael D. Greer, Esquire  
[mgreer@greerlawfirm.com](mailto:mgreer@greerlawfirm.com)

Judson M. Lee, Esquire  
[jlee@ms-lawyer.net](mailto:jlee@ms-lawyer.net)

William B. Kirksey, Esquire  
[mslawyer4183@aol.com](mailto:mslawyer4183@aol.com)

And I hereby certify that I have mailed by U.S.P.S the document to the following non-ECF participants:

Timothy Balducci  
12739-042  
FCI-Estill  
Satellite Camp - Unit F  
P.O. Box 699  
Estill, SC 29918

By: /s/ Vicki R. Slater

VICKI R. SLATER, MSB 9759